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February 21, 2013

Via ECF

Honorable Lois H. Goodman, U.S.M.J.
Clarkson S. Fisher Federal Courthouse, Room 7050
492 E. State Street
Trenton, New Jersey 08608

Re: Bayliss v New Jersey State Police, et al.
Docket No.: 11-cv-0890
Our File No.: 24090-20

Dear Judge Goodman:

At our recent conference, Your Honor requested that the Attorney General's Office advise the Court if it was interested in another mediation session with Judge Keefe. The State remains committed to reaching a reasonable settlement and believes that Judge Keefe continues to be a valuable resource towards that end.

During the mediation session with him, he advised that he felt that the major stumbling block was the parties' divergent perspectives on the substance of the case. In his view, some limited discovery would likely obviate these differences and draw the parties closer in their evaluation of its settlement value.

Given Judge Keefe's long history of success in mediating disputes, the State would defer to his guidance and seeks to conduct the limited discovery which he envisioned, prior to renewing mediation. We believe that this course represents the best chance at reaching a satisfactory resolution.

Should the Court have any further questions, please advise us. We appreciate the Court's courtesies.

Respectfully yours,
SCHENCK, PRICE, SMITH & KING, LLP

A handwritten signature in dark ink, appearing to read "John M. Bowens", is written over a light blue horizontal line.

John M. Bowens

JMB/mor

cc: All Counsel - Via ECF

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